

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,	:	
	:	
Plaintiff,	:	C.A. No. 04-1205-SLR
	:	
v.	:	
	:	TRIAL BY JURY OF
	:	TWELVE DEMANDED
HARRY M. FREEDMAN, M.D.,	:	
DONNA BURNS, DR., and	:	
MAJOR R. L. HUGHES,	:	
	:	
Defendants.	:	

**DEFENDANT HARRY M. FREEDMAN, M.D.'S
RESPONSE TO PLAINTIFF'S MOTION**

COMES NOW, defendant Harry M. Freedman, M.D. (hereinafter referred to as "Dr. Freedman"), by and through undersigned counsel, hereby responds to plaintiff's Motion and states as follows:

1. This Motion is unintelligible and Dr. Freedman is unable to file a response thereto.

ELZUFON AUSTIN REARDON
TARLOV & MONDELL, P.A.

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DATE: March 22, 2006
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